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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 vs.  
23 **DECLARATION OF LINDSAY COOPER  
24 IN SUPPORT OF PLAINTIFF WAYMO  
25 LLC'S ADMINISTRATIVE MOTION TO  
26 FILE UNDER SEAL ITS MOTION FOR  
27 RELIEF RE STROZ SUBPOENA  
28 PROTOCOL AND LEVANDOWSKI  
CLAWBACK**

29 UBER TECHNOLOGIES, INC.;  
30 OTTOMOTTO LLC; OTTO TRUCKING  
31 LLC,

32 Defendants.

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1 I, Lindsay Cooper, declare as follows:

2       1. I am an attorney licensed to practice in the State of California and am admitted to  
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6       2. I make this declaration in support of Waymo’s Administrative Motion to File Under  
 7 Seal confidential information in its Motion for Relief re: Stroz Subpoena Protocol and Levandowski  
 8 Clawback (“Waymo’s Administrative Motion”). Waymo’s Administrative Motion seeks an order  
 9 sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit 2 to Waymo’s Motion for Relief	Entire Document	Defendants

10       3. Waymo’s Motion and exhibits contain information that non-party Mr. Levandowski  
 11 has designated as confidential and/or highly confidential.

12       4. Waymo takes no position on the merits of sealing the designated material, and expects  
 13 Mr. Levandowski to file one or more declarations in accordance with the Local Rules.

14       I declare under penalty of perjury under the laws of the State of California that the foregoing is  
 15 true and correct, and that this declaration was executed in San Francisco, California, on August 24,  
 16 2017.

17       By /s/ Lindsay Cooper

18                   Lindsay Cooper  
 19                   Attorneys for WAYMO LLC

20                   **SIGNATURE ATTESTATION**

21       Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
 22 filing of this document has been obtained from Lindsay Cooper.

23                   /s/ Charles K. Verhoeven  
 24                   Charles K. Verhoeven